

Applicant respectfully submits that the '702 patent discloses a Group Publishing System for permitting coordinated publishing of documents by multiple authors and/or editors ('702 patent, abstract). However, unlike the present invention, the '702 patent does not disclose the ability to simultaneously display multiple versions of an edited document for visual comparison as required by claims 1 and 22, and amended claim 17 of the present invention. In addition, Applicant respectfully submits that the '592 patent discloses a system for keeping track of various revisions to a file as it is edited ('592 patent, abstract). However, unlike the present invention, the '592 patent does not disclose the ability to simultaneously display multiple versions of an edited document for visual comparison as required by claims 1 and 22, and amended claim 17 of the present invention. The '592 patent discloses that, "a list of version information can be displayed" ('592 patent, Col. 1, lines 44-45) and the Figures illustrate that various files can be illustrated on a timeline; however, there is no provision for simultaneously displaying multiple versions of a document for visual comparison.

Applicant respectfully submits that the '790 patent is directed toward an electronic document delivery system ('790 patent, abstract), and the Adobe review is directed toward utilization of Portable Document Formats, and that both the '790 patent and the Adobe review fail to disclose simultaneously displaying multiple versions of an edited document for visual comparison as required by claims 1 and 22, and amended claim 17 of the present invention.

Applicant further respectfully submits that the Examiner has had to combine four different prior art references and then further modify those references to state an obvious rejection for the present invention. Although the '702 patent relates to a Group Publishing System, neither the '592 patent nor the '790 patent are directed toward a Group Publishing System, and without the present application as a guide, there is no motivation to combine these references and then further modify them in a way not disclosed in any of them either individually or in combination. Having

simultaneous display of versions and notes provides a very significant advantage over the systems disclosed in the cited references, however, none of them contemplate or allude to this advantage. Simultaneous display is a specific problem identified in the application that the present invention was designed to overcome (page 4, lines 1-8) and is one of the primary objects of the invention (page 4, lines 10-12).

Therefore, because none of the following references, the '702 patent, the '592 patent, the '790 patent and the Adobe review, teach, disclose or suggest simultaneously displaying multiple versions of an edited document for visual comparison as required by claims 1 and 22, and amended claim 17, none of the cited references, alone or in any combination, can render claims 1 and 22, and amended claim 17 obvious.

With regard to claim 10, Applicant respectfully submits that the Examiner has stated that none of the cited prior art references discloses "formatting the requested document together with the associated plurality of comments for simultaneous display to permit review" as required by claim 10. The Examiner has submitted that it would be obvious at the time of invention to display notes simultaneously with the associated version. Applicant respectfully submits that none of the cited references discloses simultaneous display between various versions, between various notes, or between versions and notes associated therewith. The '592 patent discloses visual display of version information and configuration information ('592 patent, Figure 11), but does not teach, disclose or suggest simultaneous display of either versions or notes in any combination. Applicant further respectfully submits that the '702 patent, the '790 patent, and the Adobe review also fail to teach, disclose or suggest simultaneous display of either versions or notes in any combination.

As stated above, Applicant respectfully submits that the Examiner has had to combine four different prior art references and then further modify those references to state an obvious rejection for the present invention. Without the present application as

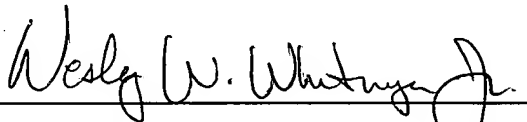
a guide, Applicant submits that there is no motivation to combine these particular cited references and then further modify them to arrive at the present invention.

Simultaneous display provides very significant advantages over the combined cited references, however, none of them teach, disclose or suggest this advantage either individually or in any combination.

Therefore, because none of the following references, the '702 patent, the '592 patent, the '790 patent and the Adobe review, teach, disclose or suggest formatting the requested document together with the associated plurality of comments for simultaneous display to permit review as required by claim 10, none of the cited references, alone or in any combination, can render claim 10 obvious.

It is respectfully submitted that claims 1-22, all of the claims remaining in the application, are in order for allowance, and early notice to that effect is respectfully requested.

Respectfully submitted,



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